

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

KENNETH JOHNSON and JACQUELYN)	
JOHNSON, as Co-Administrators for and on)	
Behalf of the Estate of Kendrick Lamar Johnson,)	
A Minor,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	NO.: 7:20-cv-00004-HL
BRIAN BELL, ET AL.)	
)	
Defendants.)	

**DEFENDANTS WESLEY “WES” TAYLOR AND LOWNDES COUNTY SCHOOL
DISTRICT’S MOTION TO DISMISS BY WAY OF SPECIAL APPEARANCE**

COME NOW Defendants Wesley “Wes” Taylor (“Taylor”) and Lowndes County School District (the “School District”) (collectively “these defendants”), by way of special appearance and without waiving and specifically reserving all defenses available to them, and file this motion pursuant to Federal Rule of Civil Procedure 12(b) and 4(m) and Local Rule 7.1, requesting that the Court dismiss plaintiffs’ complaint (Doc. 1) against them.

In support of this motion, these defendants rely on the arguments and citations to authority presented in the accompanying memorandum of law, which these defendants have filed contemporaneously with this motion. As shown in the memorandum of law, these defendants’ motion should be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANTS WESLEY “WES” TAYLOR AND LOWNDES COUNTY SCHOOL DISTRICT’S MOTION TO DISMISS BY WAY OF SPECIAL APPEARANCE** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification to the following:

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This 25th day of June, 2020.

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